

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

RICHARD LYNN WINFREY, JR.,	§	
Plaintiff,	§	CIVIL ACTION NO. 4:10-CV-1896
	§	
vs.	§	
	§	
SAN JACINTO COUNTY, San Jacinto	§	JURY TRIAL DEMANDED
County Sheriff JAMES WALTERS,	§	
Former San Jacinto County Sheriff	§	
LACY ROGERS, Former San Jacinto	§	
County Sheriff's Department Deputy	§	
LENARD JOHNSON,	§	
Texas Ranger GROVER HUFF,	§	
Texas Ranger RONALD DUFF,	§	
FORT BEND COUNTY, Fort Bend County	§	
Sheriff MILTON WRIGHT, Former	§	
Fort Bend County Sheriff's Department	§	
Deputy KEITH PIKETT, and as-of-yet	§	
unknown employees of San Jacinto County,	§	
as-of-yet unknown Texas Rangers, and	§	
as-of-yet unknown employees of	§	
Fort Bend County,	§	
Defendants.	§	

AFFIDAVIT OF SHERIFF'S DEPUTY KEITH PIKETT

Exhibit “A”

Written records from the Fort Bend County Sheriff's Office made by Sheriff's Deputy K. Pikett relating to his participation in the Murray Wayne Burr homicide investigation, conducted primarily in San Jacinto County, Texas, beginning on August 24, 2004.

SUPPLEMENT TO CASE # 32174
SAN JACINTO SHERIFF'S DEPARTMENT
HOMICIDE
BY DEPUTY K. PIKETT FBSO 330

ON TUESDAY AUGUST 24, 2004 I, DEPUTY K. PIKETT, FBSO 330, PERFORMED SCENT PAD LINE-UPS WITH MY SCENT DISCRIMINATING BLOODHOUNDS QUINCY AND JAG. THE LINEUP WAS PERFORMED IN THE FIELDS BEHIND THE SHERIFF'S OFFICE ON CEDAR. THE LINEUPS WERE STARTED AT APPROXIMATELY 1040 HOURS.

THE LINEUP WAS PERFORMED BY ALLOWING THE BLOODHOUND TO SMELL AN OBJECT CONTAINING THE SPECIFIC SCENT OF AN INDIVIDUAL FROM A CRIME SCENE ITEM THE PERSON HAS BEEN IN CONTACT WITH AND THEN MATCHING THAT SCENT WITH THE SAME POTENTIAL SCENT PRESENT IN THE LINE-UP. A SAMPLE OF SIX GAUZE SCENT PADS WITH TWO BEING FROM POTENTIAL SUSPECTS AND FOUR OTHER PEOPLE ARE PLACED ON THE GROUND APPROXIMATELY 10 WALKING STEPS FROM EACH OTHER. THE LINE-UP IS LAID OUT SO THAT THE WIND IS PERPENDICULAR TO THE GAUZE SCENT PADS. THE SCENT PADS WERE PLACED OUT BY TEXAS RANGER G. HUFF, AND I HAD NO KNOWLEDGE AS TO WHICH POSITION THE POTENTIAL SUSPECT(S) WERE IN.

THE BLOODHOUNDS ARE PRAISED AND GIVEN A FOOD REWARD WHETHER OR NOT THEY ALERT ON ANY OF THE POSITIONS. ALL THE SCENT PADS ARE THE SAME RACE AND SEX.

LINE-UP #1: QUINCY WAS ALLOWED TO SMELL THE SCENT PAD FROM THE VICTIM'S PANTS AND SHIRT. QUINCY WAS WALKED BY THE SIX GAUZE SCENT PADS ONE AT A TIME AND ALERTED ON POSITION 4, WHICH WAS THE SCENT PAD OF RICHARD WINFREY JR. [REDACTED]

.LINE-UP #1:

1	2	3	4	5	6
D. POE	C. HAMMON	P. REID	R. WINFREY	H. BUNTING	R. HOLLMAN

LINE-UP #2: JAG WAS ALLOWED TO SMELL THE SCENT PADS FROM THE VICTIM'S PANTS AND SHIRT. JAG WAS WALKED BY THE SIX GAUZE SCENT PADS ONE AT A TIME AND ALERTED ON POSITION 4, WHICH WAS THE SCENT PAD OF RICHARD WINFREY JR. [REDACTED]

.LINE-UP #2:

1	2	3	4	5	6
D. POE	C. HAMMON	P. REID	R. WINFREY	H. BUNTING	R. HOLLMAN

THE SCENT PADS WERE THEN MOVED APPROXIMATELY TEN FEET TO THE RIGHT AND QUINCY WAS SCENTED ON THE VICTIM'S CLOTHING AGAIN. I MADE A MISTAKE BECAUSE I HAD THE SCENT PADS MOVED DOWNWIND AND QUINCY GOT THE SCENT OF THE FIRST SUSPECT. THE SCENT PADS WERE THEN MOVED UP WIND WITH ONE OF THE SIX SCENT PADS BEING A POTENTIAL SUSPECT. THE SCENT PADS WERE PLACED OUT AGAIN BY RANGER G. HUFF.

LINE-UP #3: QUINCY WAS ALLOWED TO SMELL THE SCENT PAD FROM THE VICTIM'S PANTS AND SHIRT. QUINCY WAS WALKED BY THE SIX GAUZE SCENT PADS ONE AT A TIME AND ALERTED ON POSITION 6, WHICH WAS THE SCENT PAD OF MEGAN WINFREY [REDACTED]

.LINE-UP #3:

1	2	3	4	5	6
J. TYREE	A. DOUGHERTY	B. JOWERS	N. OLHEISE	M. BATES	M. WINFREY

LINE-UP #4: JAG WAS ALLOWED TO SMELL THE SCENT PADS FROM THE VICTIM'S PANTS AND SHIRT. JAG WAS WALKED BY THE SIX GAUZE SCENT PADS ONE AT A TIME AND ALERTED ON POSITION 6, WHICH WAS THE SCENT PAD OF MEGAN WINFREY [REDACTED]

.LINE-UP #4:

1	2	3	4	5	6
J. TYREE	A. DOUGHERTY	B. JOWERS	N. OLHEISE	M. BATES	M. WINFREY

LINE-UP #5: QUINCY WAS ALLOWED TO SMELL THE SCENT PAD FROM THE VICTIM'S PANTS AND SHIRT. QUINCY WAS WALKED BY THE SIX GAUZE SCENT PADS ONE AT A TIME AND DID NOT ALERT ON ANY OF THE POSITIONS.

.LINE-UP #5:

1	2	3	4	5	6
B. SMITH	P. WESSON	A. SZARF	K. FOWLER	SWENSON	M. REES

LINE-UP #6: JAG WAS ALLOWED TO SMELL THE SCENT PAD FROM THE VICTIM'S PANTS AND SHIRT. JAG WAS WALKED BY THE SIX GAUZE SCENT PADS ONE AT A TIME AND DID NOT ALERT ON ANY OF THE POSITIONS.

.LINE-UP #6:

1	2	3	4	5	6
B. SMITH	P. WESSON	A. SZARF	K. FOWLER	SWENSON	M. REES

AT APPROXIMATELY 1205 HOURS QUINCY, THE SCENT DISCRIMINATING BLOODHOUND, WAS SCENTED AT THE VICTIM'S TRAILER AT 851 WILLOW SPRINGS USING THE SCENT PAD FROM RICHARD WINFREY JR. QUINCY TRAILED OUT THE LAWN AND EAST ON WILLOW SPRINGS AND PAST THREE HOUSES. QUINCY WAS STOPPED. I CONTINUED THE DROP TRAIL APPROXIMATELY 100 YARDS BEFORE FM 946 WITH JAG, THE SCENT DISCRIMINATING BLOODHOUND. THE SAME SCENT PAD WAS USED THROUGH THE WHOLE TRAIL. JAG CONTINUED PAST A HOUSE EAST ON WILLOW SPRINGS AND SOUTH ON FM 946. QUINCY WAS SCENTED A 100 YARDS BEFORE SNOW HILL ROAD AND TRAILED PAST THE ROAD AND CONTINUED SOUTH ON FM 946. QUINCY WAS RE SCENTED 100 YARDS BEFORE HARRELL ROAD AND WENT PAST THE INTERSECTION AND CONTINUED SOUTH ON FM 946. JAG WAS RE SCENTED 100 YARDS BEFORE WINFREY ROAD AND TURNED WEST ONTO WINFREY ROAD FROM FM 946. QUINCY WAS RE SCENTED APPROXIMATELY 150 YARDS BEFORE 1350 WINFREY ROAD. QUINCY TRAILED WEST AND UP THE DRIVEWAY OF THE RESIDENCE AT 1400 WINFREY. JAG WAS RE SCENTED APPROXIMATELY 100 YARDS BEFORE 1420 WINFREY. JAG TRAILED EAST ON WINFREY AND UP THE DRIVEWAY AT 1400 WINFREY.

I DID NOT KNOW THE ADDRESS OR LOCATION OF THE POTENTIAL SUSPECTS. I WAS TOLD THAT IT WAS THREE OR FOUR MILES AWAY SO THAT IS WHY I DROP TRAILED.

I WAS ON MY WAY BACK TO FORT BEND WHEN I WAS CALLED BY RANGER HUFF WHO INFORMED ME THAT BECAUSE OF A MIX UP THE BLOODHOUNDS HAD BEEN SCENTED ON THE SCENT PAD OF CHRIS HAMMON FROM THE VICTIM'S TRAILER.

SUPPLEMENT TO HOMICIDE
SAN JACINTO SHERIFF'S OFFICE
CASE # 2004-00282
BY DEPUTY K. PIKETT FBSO 330

ON WEDNESDAY AUGUST 22, 2007 AT APPROXIMATELY 1145 HOURS I, DEPUTY K. PIKETT, FBSO 330, PERFORMED A SCENT PAD LINE-UP WITH MY SCENT DISCRIMINATING BLOODHOUNDS QUINCY, JAMES BOND, AND CLUE.

THE LINEUP WAS PERFORMED BY ALLOWING THE BLOODHOUND TO SMELL AN OBJECT CONTAINING THE SPECIFIC SCENT OF AN INDIVIDUAL FROM A CRIME SCENE ITEM THE PERSON HAS BEEN IN CONTACT WITH AND THEN MATCHING THAT SCENT WITH THE SAME POTENTIAL SCENT PRESENT IN THE LINEUP. A SAMPLE OF SIX GAUZE SCENT PADS WITH ONE BEING FROM A POTENTIAL SUSPECT AND FIVE OTHER PEOPLE ARE PLACED ON THE GROUND APPROXIMATELY 10 WALKING STEPS FROM EACH OTHER. THE LINEUP IS LAID OUT SO THAT THE WIND IS PERPENDICULAR TO THE GAUZE SCENT PADS. THE SCENT PADS WERE PLACED AT EACH LOCATION BY RANGER R. DUFF AND I HAD NO KNOWLEDGE AS TO WHICH SCENT PAD WAS THE POTENTIAL SUSPECT.

THE SCENT PADS WERE ALL OF INDIVIDUALS OF THE SAME RACE AND SEX. THE BLOODHOUNDS ARE REWARDED WHETHER OR NOT THEY ALERT ON A SCENT PAD.

LINEUP #1: JAMES BOND WAS ALLOWED TO SMELL THE SCENT PAD TAKEN FROM THE VICTIM'S CLOTHING. BOND WAS WALKED BY THE SIX GAUZE SCENT PADS ONE AT A TIME AND ALERTED ON POSITION 4, WHICH WAS THE SCENT PAD OF RICHARD WINFREY SR.

LINEUP #2: QUINCY WAS ALLOWED TO SMELL THE SCENT PAD TAKEN FROM THE VICTIM'S CLOTHING. QUINCY WAS WALKED BY THE SIX GAUZE SCENT PADS ONE AT A TIME AND ALERTED ON POSITION 4, WHICH WAS THE SCENT PAD OF RICHARD WINFREY SR.

LINEUP #3: CLUE WAS ALLOWED TO SMELL THE SCENT PAD TAKEN FROM THE VICTIM'S CLOTHING. CLUE WAS WALKED BY THE SIX GAUZE SCENT PADS ONE AT A TIME AND ALERTED ON POSITION 4, WHICH WAS THE SCENT PAD OF RICHARD WINFREY SR.

THE FOLLOWING WERE THE POSITIONS OF THE SCENT PADS IN THE LINEUPS.

1. E. FONSECA
2. T. ROBERTS
3. L. CORNWELL
4. R. WINFREY SR.
5. J. STEINFELD
6. D. HARRIS